UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting   Docket No. RM2021-1
(Proposal Seven)

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST2

(February 18, 2021)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public
Representative requests that an Information Request be issued to obtain additional
clarifying data and information from the Postal Service concerning the proposed
changes to analytical methods for calculating attributable Special Purpose Route (SPR)
city carrier costs, labeled as Proposal One.[1] The proposed questions seek information
that will allow participants to provide more constructive comments and evaluate whether
the proposal meets the applicable legal and regulatory requirements. Obtaining this
information will also contribute to a better understanding of how the Postal Service has
interpreted Commission rules and allow the Commission to make a fully informed,
reasoned determination on whether Proposal One meets applicable legal and regulatory
requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

Proposed Question(s)

1. Please refer to Docket No. RM2021-1, "Research on Updating Purchased
    Highway Transportation Variabilities to Account for Structural Changes," by
    Michael D. Bradley (Bradley Report), November 9, 2020 at 44-46.

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[1]Docket No. RM2020-1, Petition of The United States Postal Service for the Initiation of a Proceeding to
Consider Proposed Changes in Analytical Principles (Proposal Seven) November 9, 2020 (Petition).

    a. Please confirm that the text maintains that because the re-estimation of Intra-P&DC variabilities to correct for the removal of DRO routes, "is a re-estimation of an existing set of established models, model specification is straightforward. The established translog model, in both cubic foot-miles and route length, will be estimated for all three sets of contract cost segments."

    b. If you do not confirm, please explain.

2. Please refer to Docket No. RM2021-1, RM2021-1-NP1, INTRA PDC Variability Equations.sas.

    a. Please confirm that if the sas code: data box; set intra_pdc; if vcube le 300 or routetypedesc = 'box route'; run; is inserted after the existing sas code: data intra_pdc; set intra_pdc; it will show that there are 603 observations from which an Intra P&DC, Box Regression could be performed.

    b. If you do not confirm, please explain.

3. Please refer to Docket No. RM2014-6, USPS-RM2014-6/1 - Public Material Relating to Proposal Six, Rpt.Updat.PHT.Cost.Cap.Variab.docx (Bradley 2014 Report), June 20, 2014 at 11-12.

    a. Please confirm that the Bradley 2014 Report explains that a box route regression is included in the Intra P&DC regressions.

    b. If you do not confirm, please explain.

4. Please explain why either box route (only) regression(s) were not included, or a box route dummy was not included, in the regressions used to correct for removing DRO routes from Intra-P&DC regressions.

Respectfully Submitted

Lawrence Fenster, Public Representative

901 New York Avenue, N.W., Suite 200
Washington, DC 20268-0001
Phone (202) 789-6862
Email: larry.fenster@prc.gov